

Steve Jakubowski (admitted *pro hac vice*)
Elizabeth Richert (admitted *pro hac vice*)
THE COLEMAN LAW FIRM
77 West Wacker Dr., Suite 4800
Chicago, Illinois 60601
Telephone: (312) 606-8641
Facsimile: (312) 444-1028
sjakubowski@colemanlawfirm.com

Attorneys for Callan Campbell, Kevin Junso, *et al.*,
Edwin Agosto, Kevin Chadwick, *et al.*, and Joseph Berlingieri

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

-----X	:	
In re	:	Chapter 11 Case No.
	:	
GENERAL MOTORS CORP., <i>et al.</i> ,	:	09-50026 (REG)
	:	
Debtors.	:	(Jointly Administered)
	:	
-----X		

NOTICE OF APPEAL OF SALE ORDER

PLEASE TAKE NOTICE that Callan Campbell, Kevin Chadwick, *et al.*, Edwin Agosto, Kevin Junso, *et al.*, and Joseph Berlingieri (collectively, the “**Individual Accident Litigants**”), by and through their undersigned counsel, hereby appeal to the United States District Court for the Southern District of New York under 28 U.S.C. § 158(a) from the Order (I) Authorizing Sale of Assets Pursuant to Amended and Restated Master Sale and Purchase Agreement with NGMCO, Inc., a U.S. Treasury-Sponsored Purchaser; (II) Authorizing Assumption and Assignment of Certain Executory Contracts and Unexpired Leases in Connection with the Sale; and (III) Granting Related Relief (the “Sale Order”) entered by the United States Bankruptcy Court for the Southern District of New York (Judge Robert E. Gerber) (Docket No. 2968). The

names of all parties to the orders appealed from and the names, addresses, and telephone numbers of their respective attorneys are as follows:

Parties

Individual Accident Litigants

Attorneys

Steve Jakubowski
Elizabeth Richert
The Coleman Law Firm
77 West Wacker Drive, Suite 4800
Chicago, IL 60601
Tel: (312) 606-8641

The Debtors

Harvey R. Miller
Stephen Karotkin
Joseph H. Smolinsky
Weil, Gotshal & Manges LLP
767 Fifth Avenue
New York, New York 10153
Tel: (212) 310-8000

The Official Committee of Unsecured Creditors

Kenneth H. Eckstein
Thomas Moers Mayer
Robert Schmidt
Jeffrey S. Trachtman
Kramer Levin Naftalis & Frankel LLP
1177 Avenue of the Americas
New York, New York 10036
Tel: (212) 715-9100

Office of the United States Trustee

Diana G. Adams
Office of the United States Trustee
33 Whitehall Street, 21st Floor
New York, NY 10004
Tel: (212) 510-0500

*Counsel to the United States Treasury
and NGMCO, Inc.*

Lev L. Dassin (Acting US Atty., SDNY)
David S. Jones
Jeffrey S. Oestericher
Matthew L. Schwartz
Joseph N. Cordaro
Tel: (212) 637-1945/2745

-and-

John J. Rapisardi
Peter Friedman
Cadwalader, Wickersham & Taft LLP
One World Financial Center
New York, New York 10281
Tel: (212) 504-5585

*Counsel for The International Union,
United Automobile, Aerospace & Agricultural
Implement Workers of America, AFL-CIO*

James L. Bromley
Avram E. Luft
Cleary Gottlieb Steen & Hamilton
One Liberty Plaza
New York, NY 10006
Tel: (212) 225-2264

-and-

Babette A. Ceccotti
Cohen, Weiss and Simon LLP
330 West 42nd Street
New York, NY 10036
Tel: (212) 563-4100

Counsel to Export Development Canada

Michael J. Edelman
Michael L. Schein
Vedder Price P.C.
1633 Broadway, 47th Floor
New York, NY 10019
Tel: (212) 407-7770

Counsel to the United Steelworkers

Suzanne Hepner
Levy Ratner, P.C.
80 Eighth Avenue, Eighth Floor
New York, NY 10011
Tel: (212) 627-8100

Dated: July 6, 2009

Respectfully submitted,

CALLAN CAMPBELL, KEVIN JUNSO, *ET AL.*, KEVIN
CHADWICK, *ET AL.*, EDWIN AGOSTO, AND JOSEPH
BERLINGIERI

By: /s/ Steve Jakubowski
One of Their Attorneys

Steve Jakubowski (admitted *pro hac vice*)
Elizabeth Richert (admitted *pro hac vice*)
THE COLEMAN LAW FIRM
77 West Wacker Drive, Suite 4800
Chicago, IL 60601
Tel: (312) 606-8641
Fax: (312) 444-1028
sjakubowski@colemanlawfirm.com

Attorneys for Callan Campbell, Kevin Junso, *et al.*,
Edwin Agosto, Kevin Chadwick, *et al.* and Joseph
Berlingieri

CERTIFICATE OF SERVICE

I, Steve Jakubowski, hereby certify that I served a copy of the **NOTICE OF APPEAL OF SALE ORDER** on the parties listed below via email unless otherwise specified. Additionally, upon electronically filing with the Clerk of the Court all parties were served via the Court's electronic notification system on July 6, 2009.

/s/ Steve Jakubowski

Harvey R. Miller, Esq. Stephen Karotkin, Esq. Joseph H. Smolinsky, Esq. Weil Gotshal & Manges LLP 767 Fifth Ave. New York, New York 10153 harvey.miller@weil.com stephen.karotkin@weil.com Joseph.Smolinsky@weil.com	John J. Rapisardi, Esq. Cadwalader, Wickersham & Taft LLP One World Financial Center New York, New York 10281 john.rapisardi@cwt.com
Gordon Z. Novod, Esq. Thomas Moers Mayer, Esq. Kramer Levin Naftalis & Frankel, LLP 1177 Avenue of the Americas New York, NY 10036 gnovod@kramerlevin.com tmayer@kramerlevin.com	James L. Bromley, Esq. Cleary Gottlieb Steen & Hamilton LLP One Liberty Plaza New York, New York 10006 jbromley@cgsh.com
Babette Ceccotti, Esq. Cohen Weiss & Simon LLP 330 W. 42 nd Street New York, New York 10036 bceccotti@cwsny.com	Michael J. Edelman, Esq. Michael L. Schein, Esq. Vedder Price, P.C. 1633 Broadway, 47 th Floor New York, New York 10019 mjedelman@vedderprice.com mschein@vedderprice.com
<u>VIA ECF ONLY</u> Diana G. Adams, Esq. Office of the U.S. Trustee For the Southern District of NY 33 Whitehall St. , 21 st Floor New York, New York 1004 Facsimile: (212) 668-2255	<u>VIA EMAIL</u> David S. Jones, Esq. Matthew L. Schwartz, Esq. U.S. Attorney's Office, S.D.N.Y. 86 Chambers Street, Third Floor New York, New York 10007 Facsimile: (212)637-2684 Matthew.Schwartz@usdoj.gov David.Jones6@usdoj.gov